UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Court File No. 11-cv-1452 (MJD/AJB)

DEUTSCHE BANK TRUST COMPANY AMERICAS, in its capacity as successor indenture trustee for certain series of Senior

Notes, et. al.,

NOTICE OF FILING OF MOTION

CLASS ACTION

Plaintiffs, TO TRANSFER FOR **COORDINATED OR**

VS. CONSOLIDATED PRETRIAL

PREEDINGS PURSUANT TO U.S. BANK, N. A.,

28 U.S.C. § 1407 Defendant.

TO: DEFENDANTS ABOVE-NAMED AND THEIR ATTORNEYS.

PLEASE TAKE NOTICE that on August 16, 2011, Plaintiffs Deutsche Bank Trust Company Americas, Law Debenture Trust Company of New York, and Wilmington Trust Company, in their capacity as successor indenture trustees for certain notes of Tribune Company (collectively, "Plaintiffs") moved the United States Judicial Panel on Multidistrict Litigation, pursuant to 28 U.S.C. § 1407, to transfer 44 actions pending in 21 different federal districts, including this action, to the Southern District of New York for coordinated and consolidated pretrial proceedings under the caption *In re* Tribune Fraudulent Conveyance Litigation (Pending Docket No. 119), specifically to the Honorable Richard J. Holwell (the "MDL Motion"). Plaintiffs provide this notice pursuant to 28 U.S.C. § 1407(c)(ii) and Rule 6.2 of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation.

A copy of the Notice of the MDL Motion (Exhibit 1), Brief in Support of the MDL Motion (Exhibit 2), Declaration of David M. Zensky in Support of the MDL Motion (Exhibit 3), Schedule of Actions (Exhibit 4), and Proof of Service of the MDL Motion (Exhibit 5) are attached.

Dated this 17th day of August, 2011. **KELLEY, WOLTER & SCOTT, P.A.**

s/Kevin M. Magnuson

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